

SUPPLEMENTAL RESPONSES TO INTERROGATORIES

1. With regard to Interrogatories 1-4, 5b, 10 and 11, - the "members of the SKO staff," - besides Messrs. Squier, Knapp and Ochs there was a male production assistant and a female production assistant, both of whose names I do not remember.
2. With regard to Interrogatories 1-4, 5b, 10 and 11 - "the negative research staff of the DNC," - there were two males in charge, both of whose names I do not remember.
3. With regard to Interrogatories 1-4, 5b, 6, 7, 10 and 11, the address for Bill Curry is 119 Town Farm Road, Farmington, Conn, 06032. I do not know the addresses for the other people you requested, i.e., Evelyn Lieberman, John Hillley, Mark Schwartz, Mary Smith and Brian Lee.
4. With regard to Interrogatory 5a-e, I have no additional information supplementing my original response.
5. With respect to Interrogatory 5c, I never took notes. Harold Ickes frequently took notes. Evelyn Lieberman and Erskine Bowles sometimes took notes.

VERIFICATION

STATE OF NEW YORK)

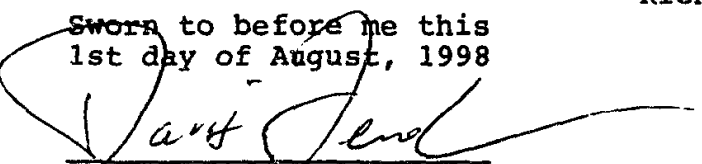
ss.:

COUNTY OF NEW YORK)

RICHARD S. MORRIS, being duly sworn, deposes and says: Deponent is the witness in the within matter; Deponent has read the foregoing Responses and Supplemental Responses to Interrogatories; knows the contents thereof; the same is true to deponent's own knowledge, except as to the matters therein alleged upon information and belief, and those matters deponent believes to be true.


RICHARD S. MORRIS

Sworn to before me this
1st day of August, 1998


Notary Public
DAVID LENEVSKY
NOTARY PUBLIC, STATE OF NEW YORK
No. 123456789
Qualified in New York County
Term Expires March 30, 1999

FUND RAISING

TO: THE PRESIDENT

Re: Agenda For Meeting -- March 2, 1995

Campaign Overview

1. Use of paid media -- major use of paid media different from other Presidential races

A. Need not to take federal funds

-- With federal funding, \$37 million likely total, \$7.5 for fund raising:
Probably less than \$20 million for TV

-- With federal funding, no ability to do TV in key primary states

-- If assume half available for media and half for field/Pres visits:

STATE	TOTAL LIMIT	MEDIA POINTS
Iowa	\$914,000	2500
New Hamp (include MA)	\$2,600,000	2800
Arizona	\$1,210,000	3300
South Carolina	\$1,160,000	2400
Colorado	\$1,100,000	4400
Georgia	\$2,100,000	4200
Idaho	\$552,000	2800
Maryland	\$1,600,000	2100
Minnesota	\$3,000,000	7142
Utah	\$552,000	3200
Washington	\$1,600,000	3500
New York	\$4,500,000	3500

(holding 1/4 for New Jersey & Connecticut)

(In three earliest primaries, less than 3 weeks of decent media coverage)

-- Limits Presidential appearances in early states, too

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3/2/95
- Testing justification for no fed \$ in poll:

- 12
- a. no primary, shouldn't take tax money
 - b. in era of cuts, spend money on Head Start
 - c. level playing field with 7 Repub. candidates

B. 3 months in 1995/themes

- May (700 points): 100,000 cops
- September (700) middle class tax cut
- November (700) welfare/immigration reform

C. January - August, 1996

- Wall to wall coverage @ 250 pts./week

D. Cost and Coverage: Pre-convention period

- National network cost: \$10,000/point
 - Would cost \$113 million, way too expensive
- Construct our own market-by-market buy costing \$3500 per point
 - Cost: \$40 million
 - Coverage: 43% of US population
 - 293 electoral votes (55% of total)
 - plus 22 easily winnable elect votes not covered=315 votes (59%)

-- Includes:

NYC
Washington, D.C.
L.A., S.F., San Diego
Ohio
Chicago
St. Louis-Kansas City
Detroit-Flint
Philadelphia-Pittsburgh
Little Rock
Tennessee
Washington State
Oregon
Dallas-Houston or Miami-Tampa
W. Virginia

3/2/95
PS

-- Costs at \$3500/pt. level:

-- May (700 pts.)	\$2.5 million
-- Sept.	\$2.5 million
-- November	\$2.5 million
-- Jan-Aug, '96	\$32.5 million

TOTAL	\$40 million
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3. PAID MEDIA

- A. Urge freedom from limits
- B. Decide on media creator now.
- C. Fund raising for \$2.5 million in June

4/27/95

March 16 95

3. Paid Media

A. Ratings improve after major speeches -- Ads will have same effect, but permanent

B. Need decision on No Federal Funds

1. Will poll rationales (see polling section)

C. Need actual fund raising for May buy

1. \$2.5 million for 700 points

2. Crime -- 100,000 cops likely theme

D. If exempt from federal limits, heavy push in NH, Ariz., Iowa

March 6, '16

V. HANDLING REPUBLICAN ATTACKS ON CLINTON

A. RNC offensive will now come very soon -- DNC fund raising is not now equipped to cope with the money needs

1. We have had trouble getting this week's DNC money together

a. this week we needed \$564,000 and got it two days late

b. next week, we need \$941,000 from DNC

c. following schedule:

March 19	\$1,281,000
March 26	1,234,000
April 2	1,234,000
April 9	1,175,000
April 16	1,175,000
April 23	1,337,000
April 30	1,299,000
May 7	1,252,000
May 14	1,252,000
May 21	1,262,000
May 28	1,300,000

TOTAL DNC AFTER THIS WEEK: \$14,747,000

2. Fund raising at DNC level must be improved

a. Republicans will have vast capacity to throw negatives and we must have money to respond

b. needs to have priority in scheduling

(5)

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3/4/95

C. facade of success won't work if Iran Deal is not dead

1. Press won't let you call it a success without killing the deal
2. Press likely won't buy half way steps toward killing the deal
3. Feel free to offer concessions in return for killing deal in public
 - a. take small hits on issues we don't care about to give Yeltsin something to take home instead of Iranian deal
 - b. Money is fungible, make quitting deal worth Russian while
 - a. in ego terms so he can take it public
 - b. in fiscal terms so we hold harmless money loss
 1. In atmosphere of good will, its doable
 2. If republicans kill money, they take blame on Iran
 3. political harm of seeming to "buy" out Russian-Iran deal is OK given harm of deal going through

ADS & PAID MEDIA

6. Paid Media Themes for June

A. Crime/Terrorism

1. 100,000 cops
2. tough sentences, limit parole
3. 1,000 FBI agents

B. Not Gun Control

C. Factual Style of Ad -- Infomercial, not rhetoric, but facts



5/4/95

E. Timing -- must be in June

1. summer levels of TV down
2. need pre-summer shot in "nonpolitical" season

F. Money and Location

1. \$2.5 million enough to reach half of country 7 times
2. will provide media market list by:
 - a. developing scale including Clinton margin of defeat or loss per media market. (stress closest markets)
 - b. includes chances of carrying state (stress closest 92 margins)
 - c. electoral vote of state
 - d. cost per point of ad
 - e. will integrate all 4 in a recommendation

7. Progress on Ricochet Theory

- A. In general, going well
- B. Villianize Right Wing Militia
- C. Don't be seen as liberal over Hablus Corpus/death penalty deal
- D. Don't hesitate to offend Republicans or ACLU by intrusive measures
 1. Listing of terrorist groups
 2. Change of Rules on Infiltration
 3. Requirement of Notification of Authorities for para-military training

5/16/95

1. Favor cut, but not of same order of magnitude as Republican cuts
2. Specific markers
 - a. Don't cut public school aid
 - b. Don't eliminate key Clinton programs
 - c. Specify areas where cuts are fine or where we need to go further
 1. Reinventing govt initiatives

g. Attack 2002 deadline

1. "A date off a bumper sticker"
2. Attack prolonged delay, but suggest 2003 or 2004 might be more reasonable
3. Demand that we show year-by-year progress deficit reduction

4. Tax cuts

a. Attack Dominici no tax cut plan

1. Need tuition deduction
2. Need IRAs
3. Need \$500 per child for mid inc people

b. Attack Gingrich tax cut plan

1. Too much money
2. No substantive targeting
3. Improperly aimed (avoid populist rhetoric)

2. NEED FOR TELEVISION ADS

A. Need to run ads in June

1. Free media can only go so far in permanent increase in ratings
2. Need to get basic messages out to the public in the spring before political season is too far along
3. TV use drops in summer, need to move in spring

B. Subject of ads should be Crime/Television

1. 100,000 cops
2. Death penalty extension

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5/16/95

3. 1,000 FBI people on terrorism
4. Show presidential toughness

C. Specialized media in specific markets where useful

D. Need to begin scripting/storyboarding now. Further delay is tantamount to saying "no" for June

E. Request approval for Squier to move ahead

3. IMMEDIATE SPEECHES COMING UP

A. Need better vetting/approval process

1. Current process has resulted in too many "pulled teeth"

a. Deportations package without drivers license

1. Got almost no coverage
2. Justice never really objected on legal grounds just was worried about too many cases
3. Unfunded mandates was never issue, program would be voluntary

b. Japan speech without aggressive rhetoric

1. Got no coverage at all
2. Lost huge opportunity to regain momentum after trip

c. Anti-crime/terrorism speech without 4 part program

1. Very little coverage
2. Justice's constitutional objections surfaced late Sunday night -- in effect they pocket vetoed the speech
3. Holtzman's legal justification of constitutionality was Oked by Larry Tribe, Burt Newborne (NYU) and Irwin Chemerinsky (SoCal) and handed to President 10 days earlier

d. Net effect: a trip not bracketed with hard domestic hits. break in momentum. Congratulations to the vettors, a few more like this and we can hang it up

II. Run TV Ads Now

A. People's minds are open to new centrist info about you in aftermath of speech

B. Only 43% of voters know about assault rifles (and only 33% about death penalty). Fill that void

1. Facts will stay in public's mind. Just as NAFTA, gays in military, pro choice, Haiti and health care will stay there
2. Arkansas experience with early media -- great recall
3. Take crime away from Republicans as issue
4. During Whitewater hearings, use paid media to keep up vote share and approval
5. We now may have the numbers we need to enter election with. We are certainly very close. Now, keep approval in high 50s and vote in mid forties and let it sink in and become baseline

June 21,
1995
p2

26-
early
August

July 26 '95 p 4

1. very good chance that good faith can prevail here
2. opportunity to begin to "pencil in" consensus
3. must be personal effort by President

B. Pressure campaign aimed at Swing Republican Senators on medicare during recess

1. Target recess paid media, funded by DNC, to aim at key moderate Republican Senators

a. Hit small states with moderate Republican Senators

Ashcroft, Missouri
Bond, Missouri
Chaffee, RI
Cohen, Me
Snow, Me
Dominici, NM
Hatfield, Oregon
Packwood, Oregon
Jeffords, Vt
Kasselbaum, Kansas
Murkowski, Alaska
Stevens, Alaska
Bennett, Utah

+ Term + Col
+ S.D. (Parker)
C

- b. 1,200 Points in these states would cost \$500,000

c. Use DNC to pay for it, we control production

d. In 1983, RNC did ads on inflation in March & July

2. Get constituency groups to bring pressure

3. flesh out Republican ideas and educate media

July
26 '95

AGENDA FOR MEETING WITH PRESIDENT ON SEPT 13, 1995

II. CAMPAIGN/DNC ADVERTISING FINANCIAL STRATEGY

A. I recommend four flights of television

P1

9/13/95

1. ranked in priority --

1. current flight on budget now-Nov 15 \$10 mil, all party
2. post primary flight, negs on repubs \$15 mil, all camp
3. primary flight, defend against attacks, \$15 mil,
\$12 mil party, \$3 mil camp
4. Nov 15- Jan 15, claim credit, \$10 mil, all party

2. Now- November 15 (second priority)

a. attack Republican education, medicare, medicaid
cuts; promote Clinton's balanced budget plan

b. \$10 million pay for it entirely with DNC money

1. swing states

2. Moderate Republican Senator States

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P2 9/13/95

c. do it through state parties so only need 40% hard money

3. November 15-January 15 (fourth -- lowest -- priority)

a. recite achievements: budget, welfare, tax cut, crime, etc.

b. \$10 mil -- all through DNC/state parties

1. swing states

4. January 15-April 15 (third priority)

a. answers to Republican primary attacks on us

b. \$15 million -- run in primary states which are also swing states for us

c. Need to work to make it state parties/DNC

1. create relationship to current legislation

2. defend more Dems than Clinton; attack more Republicans than Dole

3. run in non primary states as well

4. run in some areas well before primary

d. Ultimately, likely about \$3 mil out of campaign and \$12 mil out of party

5. Post primary April 15-Convention (second priority)

a. attack Republican nominee

b. all campaign or 441 DNC

c swing states -- \$15 million

B. Need Ads Now

1. Promote View of President as pro-balanced budget

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9/13/95

P3

- a. armor for the spending fights ahead
- b. so we get credit when deal is made
- 2. Keep pressure on Republicans over education and medicare
- 3. Build popularity so ratings can move up when deal is cut

C. Content of Ads -- Penn Mall Test Results

10/3/95

B. Avoid: caving in, pandering, fearful, no beliefs, deal maker, old style politician, weak, indecisive, flip flops

C. Procedure

1. Mail tests over weekend
2. revisions and retest next week
3. presentation at next week's meeting

IV. Free Media Themes

A. October: peacemaker: in OJ, foreign, in budget

1. Pope's visit
2. Freedom House visit about OJ or peace in globe
3. Zedillo visit
 - a. we will have polling to stress good points
4. during Zedillo: computer event
5. trio of speeches in mid-Month — theme: building America through balancing the budget
 - a. health reform — how to lower costs without cutting
 - b. tuition tax deduction — how to promote education by cutting taxes
 - c. urban agenda — welfare part 2 — creating the jobs

6. Foreign weekend — UN, Russia, China

B. November: accomplishing things for America

C. December: warm glow of success

V. How To Present Accomplishments: Squier

VI. VALUES CONTENT OF RECENT SPEECHES Penn

AGENDA FOR MEETING WITH THE PRESIDENT ON FEBURARY 22

96

C. Failure to advertise is, once again catching up with us

Feb 22 '96

1. two weeks ago we were off the air entirely
2. last week, we advertised to only 26% of US
3. This week, we are hitting only 12% of US
4. Next week, we will scheduled to hit only 12% again
5. This is just not enough to move the country

n

2/22/96

3. Third Tier:

-\$1,000 scholarship	38
- V chip	37
- evict from public housing	36
-TV ratings	34
-school uniforms	31
-environmental right to know	29
-downsize govt	28

B. Animatics:

1. Hard Kids -- crime, health ins, values, pregnancy
2. Soft Kids -- violence in media, tobacco, environ
3. Welfare
4. Economy
5. Father
6. Education
7. Victims -- Domestic violence

II. NEED FOR BUDGET/WELFARE DEAL

A. Regression analysis shows that rating of effectiveness is the single biggest factor in driving increase in vote

1. second place is values, third place is strength

B. Biggest issue in driving vote is to balance the budget fairly

1. second place is health care and crime

Feb 22 '96

MEMO FOR PRESIDENT, VICE PRESIDENT, PANETTA, ICKES,
LIEBERMAN, LEWIS AND SOSNIK ONLY

Crying Need for use of Clinton Gore media to fill the gap
in swing states.

1. In current week:

DNC buy now \$375,000 (12% of US)
CG not on the air at all

2. next week:-- 2-27--3-4

DNC buy: \$344,000 (12%)
NEED CG Money: \$673,000 (32%)

Total of US reached: 48%
Money spent: 1.0 million

3. week of 3-4 -- 3-11

DNC buy: \$650,000 (24%)
CG buy: \$537,000 (24%)

Total of US reached: 48%
Money Spent: \$1.2 million

4. week of 3-12 -- 3-18

DNC buy: \$941,000 (33%)
CG buy: \$330,000 (15%)

Total of US reached: 48%
Money spent: 1.3 million

2/22/96

5. week of 3-19 -- 3-25

DNC buy: 1,282,000 (45%)

CG buy: 88,250 (3%)

Total of US reached: 48%

Money spent: 1.4 million

6. week of 3-26 -- 4-1

DNC buy: 1,234,000 (43%)

CG buy: 0

7. week of 4-2 -- 5-28

DNC buy: \$11,290,000 (43%)

CG buy: \$820,000 (6%)

8. Total Clinton Gore Money through May 28: \$2.5 mil.

1. Unless Alexander is nominated and we cannot use DNC money to attack him.

2. If Dole is nominated, we need no additional CG money for media before May 28 since we can attack Dole with DNC money

9. Total DNC money now through May 28 \$15,733,000

3/6/96

C. So we should publicly invite Dole and Gingrich to the White House the day after super Tuesday to negotiate a budget deal

1. marathon negotiations -- high profile
2. Between Gingrich's desire for a deal and the momentum of the talks, put Dole in an impossible position
 - a. he can't be seen as the stopper or killer of a deal because he has to run with the blame
 - b. deprives him of his leadership/effective ratings
 - c. takes away his only issue: balanced budget
 - d. If talks break down or explode, we can win blame game

D. We are slipping in balanced budget ratings, we need public affirmation to regain upper hand

IV.. Media Doctrine -- Squier and Morris

A. Republicans believe in negatives mainly

1. they see positives as "pretty pictures and music"
2. they see rebuttals as a "getting off message"

B. We believe in dialogue

1. We see positives as key to winning race
2. We see rebuttal and counterpunching -- dialogue -- as way to nail a race down

March 6, '16

V. HANDLING REPUBLICAN ATTACKS ON CLINTON

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2. Fund raising at DNC level must be improved

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b. needs to have priority in scheduling

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B. Need to continue ads

Oct 11, '95 PJ

1. Ads are producing important movement and we need to continue them
2. If "train wreck" ads give us reason to hold firm
3. If "deal" ads give us criteria for victory and basis for getting credit
4. During negotiations, ads give us a context to see moves as means to an end, not flip flops or weakness
5. Reaching 97 Republican and 71 Democratic Congressional Districts

C. Content

1. Stay on cuts until Republicans signal negotiations -- keep up pressure
2. Put on education ad in rotation with medicare and, later medicaid
 - a. slippage on education, need to get it back in the game
3. Then, move to conciliation ads to set up pressure on Republicans for making a deal and laying basis for taking issue away
 - a. these ads context negotiations and don't make them flip flops

D. Weight

1. First two weeks were \$1.25 million each, recommend next week at \$1 million. Then, when negotiations start going back up to \$1.25
 - a. Go to \$1 million for next week to save money so buy can stretch through mid December
 - b. Go back up to \$1.25 million in third week because that is likely

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10/11/95

A. from Susan Thomases: 5 minute film on achievements and story of admin.

1. for sporadic low cost cable buy
2. for surrogate training and elaboration of party line
3. for sending to supporters

B. from Baer: need for radio actuality tape for each event

1. just a minute or two of time and a vast reach in audience and repetition
2. should be scripted and done at each event

VII HOW WE WILL TARGET TIME BUY -- PENN

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III. ADVERTISING -- THE KEY TO CONTINUED GROWTH AND BUDGET
WIN.

04 25 '95
P.

A. Despite week of tax increase comment flap and 7 year flap, we moved up

B. Manage debate, cover moves on budget, set up end game

C. Budget for Ads

1. Spent already: \$4.2 million through November 1

2. Proposed: November 2-21 spend \$5.4 million through Dec 1

1. Nov 2-8: \$1.8 mil Nov 9-15 \$1.8 mil Nov 16-33 \$1.5 mil
Nov 27-30 \$300,000

2. In November: Expand from 28% of America in current buy
to 40-45 percent of country

3. And go up from current 325/week to 400/week

4. Left for December: \$400,000.

a. if we need to run in December, likely cost would be
about \$2.5 million or \$2.1 mil more

D. Targeting Media -- Presentation by Penn

E. Ads -- Presentation by Squier
